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6 UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
7 AT SEATTLE

8 AMAZON.COM, INC., *et al.*,

9 Plaintiffs,

10 v.

11 GRATO INTERNATIONAL, *et al.*,

12 Defendants.  
13

CASE NO. 2:22-cv-01205-RSL

ORDER DENYING MOTION FOR  
APPOINTMENT OF COUNSEL

14 This matter comes before the Court on defendant Rizwan Iqbal's letter request for  
15 court-appointed counsel. Dkt. # 61.  
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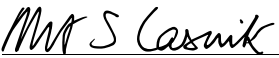
17 Generally, a person has no right to counsel in civil actions. *See Storseth v.*  
18 *Spellman*, 654 F.2d 1349, 1353 (9th Cir. 1981). However, a court may under  
19 "exceptional circumstances" appoint counsel for indigent civil litigants  
20 pursuant to 28 U.S.C. § 1915(e)(1). *Agyeman v. Corrs. Corp. of Am.*, 390  
21 F.3d 1101, 1103 (9th Cir. 2004). When determining whether "exceptional  
22 circumstances" exist, a court must consider "the likelihood of success on the  
23 merits as well as the ability of the petitioner to articulate his claims pro se in  
24 light of the complexity of the legal issues involved." *Weygandt v. Look*, 718  
F.2d 952, 954 (9th Cir. 1983). Neither of these considerations is dispositive  
and instead must be viewed together. *Wilborn v. Escalderon*, 789 F.2d 1328,  
1331 (9th Cir. 1986).

25 *Palmer v. Valdez*, 560 F.3d 965, 970 (9th Cir. 2009). In addition, the party seeking  
26 appointment of counsel must show indigency. 29 U.S.C. § 1915(e)(1).

1 Mr. Iqbal has not provided any information regarding his financial situation, the  
2 merits of the case, or his capacity to understand and defend himself from the claims  
3 asserted in this litigation. The only argument made in support of the request for court-  
4 appointed counsel is that Mr. Iqbal is in Canada and it would be difficult for him to  
5 manage counsel in Seattle, Washington. But that problem will persist regardless of whether  
6 Mr. Iqbal retains counsel or counsel is appointed by the Court.  
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8 Mr. Iqbal has not shown the sort of exceptional circumstances that justify  
9 appointment of counsel at the public's expense. The motion for appointment of counsel is  
10 therefore DENIED.  
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13 DATED this 2nd day of May, 2025.  
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17 Robert S. Lasnik  
18 United States District Judge  
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